

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____	:	
RHONDA HALL,	:	
	:	
Plaintiff,	:	
	:	
V.	:	Civil Action No. 3:05-cv-30002-MAP
	:	
VERIZON COMMUNICATIONS, INC.,	:	
and VERIZON NEW ENGLAND, INC.	:	
	:	
Defendants.	:	
_____	:	

JOINT MOTION TO MODIFY PRETRIAL
SCHEDULING ORDER

The parties to the above-entitled matter respectfully request that the Pretrial Scheduling Order be amended by extending remaining deadlines by one month, as follows:

1. Non-expert depositions to be completed by February 2, 2006;
2. The case management conference presently scheduled for January 5, 2006 to be rescheduled by the court to a date and time in February 2006;
3. Plaintiff's expert disclosures by March 1, 2006;
4. Defendants' expert disclosures by April 3, 2006; and
5. Expert depositions to be completed by May 1, 2006.

As grounds for this motion, the parties state that they have encountered differences relating to responses to written discovery requests and are in the process of attempting to resolve and narrow these differences by agreement pursuant to Local Rule 7.1(A)(2). Counsel for the parties have already resolved most of these differences, and anticipate that they will successfully resolve the

remaining differences without having to seek court intervention. However, these differences need to be resolved before previously scheduled non-expert depositions can be completed, and the parties need additional time to complete these depositions.

Respectfully submitted,

RHONDA HALL

VERIZON COMMUNICATIONS, INC.
and VERIZON NEW ENGLAND,
INC.

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